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June 11, 2021

VIA ECF

Hon. Magistrate Judge Debra Freeman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Baliga, et al. v. Link Motion Inc., et al.*, Case No. 1:18-cv-11642-VM-DCF (S.D.N.Y.);

Dear Judge Freeman:

We represent Defendant Vincent Wenyong Shi (“Shi”) and, solely with respect to the contemplated motion to dismiss the Second Amended Complaint (the “SAC”), Defendant Link Motion Inc. (the “Company”) (*see* Dkt. No. 175). We write today pursuant to the June 10, 2021 memo endorsement (Dkt. No. 224) regarding the briefing schedule for Shi’s and the Company’s renewed motions to discharge the receiver and dismiss the Second Amended Complaint (the “Dismissal Motion”). As set forth in the proposed briefing schedule, Shi and the Company agreed to elect by today whether to defer the renewal of their Dismissal Motion based on the expected filing by Plaintiff of an objection to the Court’s May 26, 2021 Memorandum Order (Dkt. No. 221).

In the interests of judicial economy and the Court’s resource in light of the Objection filed by Plaintiff on June 9, 2021 (Dkt. No. 225), Shi and the Company hereby elect to defer the renewal of the Dismissal Motion until after the Court has made a decision regarding the Objection. Shi and the Company reserve all rights with respect to the Dismissal Motion and their defenses to the claims and allegations therein.

Respectfully submitted,

/s/ Michael James Maloney

Michael James Maloney

cc: All counsel of record (via ECF)